

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

**FILED**

MAR 18 2009

William B. Guthrie  
Clerk, U.S. District Court

By \_\_\_\_\_  
Deputy Clerk

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

WILLIAMSON PENN LITTLE,

*Defendant.*

Case No. CR 09 - 033 - JHP

INDICTMENT

The Federal Grand Jury charges:

**COUNT ONE**

**[18 U.S.C. §1344 -- Bank Fraud]**

**A: INTRODUCTION**

At all times relevant to the Indictment:

1. From approximately November 26, 2007, until approximately March 2008, **WILLIAMSON PENN LITTLE**, defendant herein, had a checking account at Landmark Bank in Ardmore, Oklahoma. From November 26, 2007, until approximately March 2008, **WILLIAMSON PENN LITTLE**, defendant herein, had the authority to make deposits, withdraw funds, and direct wire transfers on said checking account.

2. Landmark Bank was at all times located in Ardmore, Oklahoma, in the Eastern District of Oklahoma. Landmark Bank was at all times a financial institution as defined by Title 18, United States Code, Section 20, and the deposits of Landmark Bank were at all times insured by the Federal Deposit Insurance Corporation.

**B. OBJECT OF THE SCHEME**

From approximately November 26, 2007, until approximately March 2008, **WILLIAMSON PENN LITTLE**, defendant herein, knowingly executed, and attempted to execute, a scheme and artifice to defraud and to obtain moneys, funds, credits, assets and other property owned by and under the custody or control of a financial institution, by means of false and fraudulent pretenses, representations and promises.

**C. MEANS OF EXECUTING THE SCHEME**

1. As part of this scheme and artifice, **WILLIAMSON PENN LITTLE**, defendant herein, made and caused to be made deposits of fictitious checks into his checking account at Landmark Bank. These representations were made, in part, in order to obtain cash and property and arrange wire transfers from Landmark Bank to various businesses, banks and financial institutions.

2. As part of this scheme and artifice, **WILLIAMSON PENN LITTLE**, defendant herein, would obtain funds from his checking account, wire funds from his checking account and pay for items with funds from his checking account. These funds were obtained and wire transfers were executed based on false representations and pretenses, in part, because **WILLIAMSON PENN LITTLE** caused to be deposited into his account fictitious checks of which no funds and credits existed.

**D. ACTS IN FURTHERANCE OF SCHEME**

For the purpose of executing the aforesaid scheme and artifice to defraud and in attempting to do so, **WILLIAMSON PENN LITTLE**, defendant herein, did deposit the following false, fictitious and bogus checks and did obtain, and cause to be obtained and

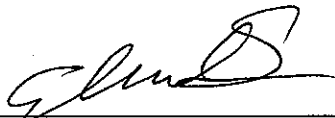
transferred, the following funds knowing that said funds were obtained on false and misleading representations and pretenses.

False/Bogus/ Fictitious Check Names	Date submitted	Total Amount of false deposits	Cash Back	Cashier Check	Wire Transfers
E-trade/Fiera Group	11/26/07	\$27,425.00	\$6,000.00 11/26/07	\$9,500.00 11/26/07	\$7,000.00 11/26/07
E-trade	11/27/07	\$18,784.21	\$9,000.00 11/28/07		\$11,220.00 11/28/07
					\$2,890.00 11/30/07

All in violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

SHELDON J. SPERLING  
United States Attorney



D. EDWARD SNOW, OBA #16439  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
FOREPERSON OF THE GRAND JURY